



Linda S. Adams  
Secretary for  
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## Department of Toxic Substances Control

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### MEMORANDUM

TO: ECI Fontana Project File

VIA: Mr. Rizgar Ghazi, P.E.  
Unit Chief  
Standardized Permitting and Corrective Action Branch

FROM: Mr. Ryan W. Batty  
Hazardous Substances Engineer  
Standardized Permitting and Corrective Action Branch

DATE: April 16, 2007

SUBJECT: CLOSURE PLAN CHANGES FROM DRAFT TO FINAL VERSION, ECI  
FONTANA, EPA ID NO CAD982484933

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ECI shall treat this memorandum as an attachment to the approved Closure Plan and provide this memorandum, along with the Closure Plan, to all contractors who will participate in the closure of the ECI Fontana facility.

The following changes apply to the "Soil Sampling Plan to Evaluate Site Conditions for Closure" prepared by Shaw Environmental and dated March 2006. The Soil Sampling Plan was conditionally approved, as part of the Draft Closure Plan package, in a letter dated December 6, 2006 subject to two conditions:

- Inclusion of the recommendations made by the Department of Toxic Substances Control (DTSC), Geological Services Unit (GSU) in a memorandum dated March 20, 2006.
- A stipulation that if the material below the asphalt paved areas is determined to be contaminated, then the asphalt will also be removed and treated as contaminated material.

The substance of the GSU's recommendations is repeated in the following statements:

- 1) Pursuant to the United States Environmental Protection Agency's *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, Update III (Method 5035)* (SW-846, June, 1997), the low range of detection limits that should be achievable by Method 5035 is 0.5 µg/kg, not 5.0 µg/kg as proposed in the Soil Sampling Plan.
- 2) The Soil Sampling Plan appears to indicate that only one EnCore sample will be collected per soil sampling location. DTSC's guidance document on implementing Method 5035 (DTSC, 2004) indicates that more co-located EnCore samples are needed to provide the laboratory with sufficient sample volume to achieve the low detection limits proposed and required.

This memorandum adds one new condition and a clarifying statement to the Closure Plan approval. These changes are made in response to comments received from a member of the public.

**Condition One:**

Ecology Control Industries (ECI) shall add an additional six sample locations to the Soil Sampling Plan. As with the existing locations, samples are to be collected at a depth of six inches and two feet below grade. The suite of tests to be performed shall be as per the sampling plan, and include the fuel oxygenates described in the following clarifying statement. The samples will be collected from the locations described below and identified on the attached map.

Sample location six is to be variable. If DTSC staff identify a low point at the site or an area where staining is present then this location can be substituted for location six as described below.

Location 1 – West Site Driveway

Mid distance between the Tank Processing Pad and west site boundary, mid distance in the north / south plane from the Tank Processing Pad.

Location 2 – Tank Holding Pad

Twenty-five (25) feet in from the west site boundary, mid distance in the north / south plane from the Tank Staging Pad.

Location 3 – North Site Driveway

Twenty feet in from the north site boundary, mid distance in the east / west plane from the Tank Holding Pad.

Location 4 – Large Roll off Bin Storage Area

Twelve (12) feet in from the east site boundary, eighty (80) feet in from the north site boundary.

Location 5 – Small Roll off Bin Storage Area

Forty (40) feet in from the east site boundary, one-hundred and twenty (120) feet in from the north site boundary.

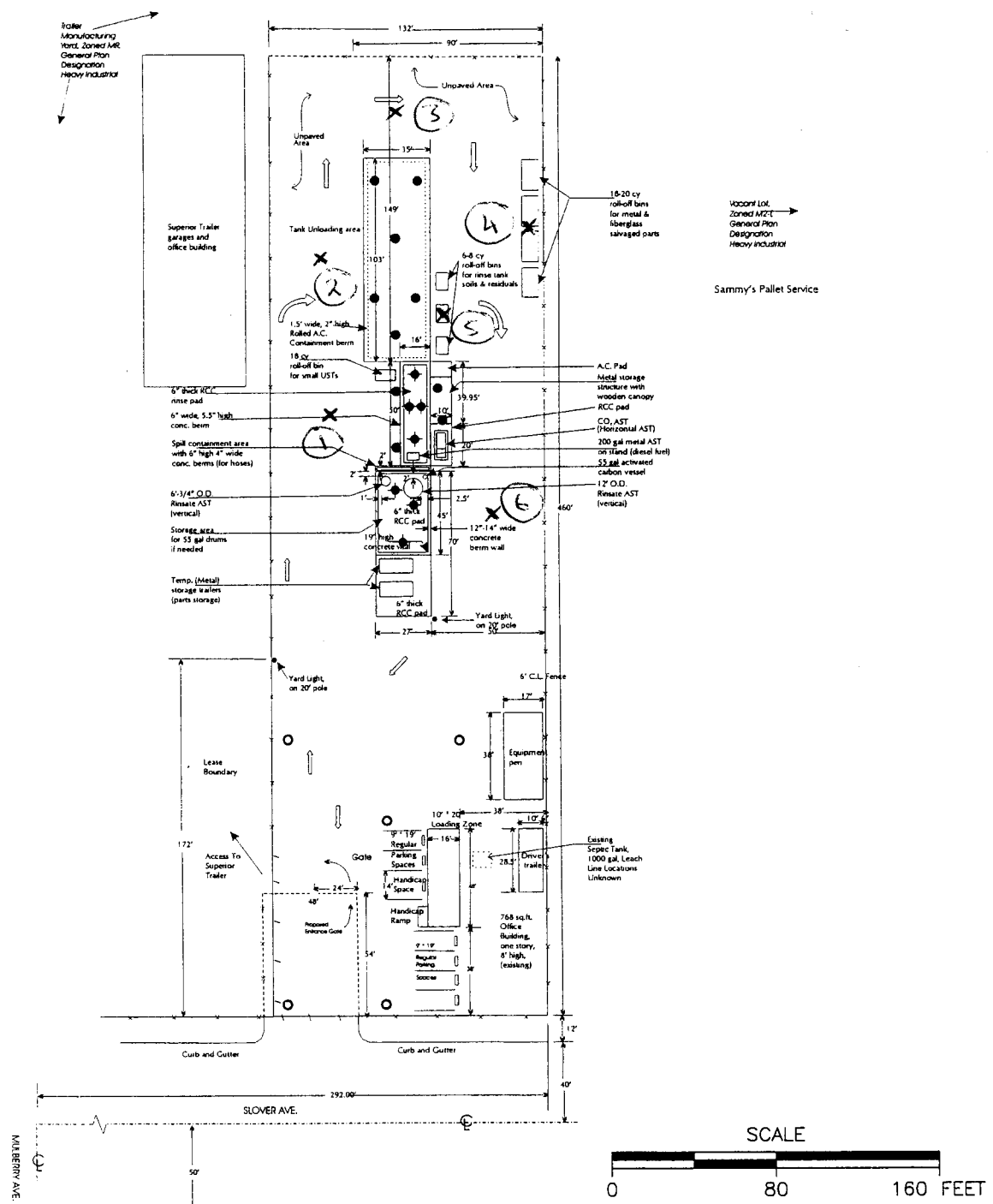
Location 6 – East Site Driveway

Mid distance between east site boundary and the Rinsate Tank Secondary Containment, mid distance in the north / south plane from the Rinsate Tank Secondary Containment.

**Clarifying Statement:**

The Soil Sampling Plan suite of tests included fuel oxygenates but did not indicate which species. ECI shall test for the following fuel oxygenates:

- Methyl tertiary-butyl ether (MTBE),
- Tertiary-butyl alcohol (TBA),
- Di-isopropyl ether (DIPE),
- Ethyl tertiary-butyl ether (ETBE),
- Tertiary-amyl methyl ether (TAME).



**LEGEND**

- SOIL SAMPLING POINT, COLLECTED 6" AND 2' BELOW SURFACE GRADE
- ★ CO-LOCATED SOIL AND CONCRETE CORE SAMPLING LOCATIONS, SOIL COLLECTED AT 6" AND 2' BELOW SURFACE GRADE
- BACKGROUND SAMPLES
- FENCE



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**FIGURE 2**  
**CONFIRMATION SOIL SAMPLE**  
**LOCATIONS**  
ECI FACILITY  
13738 SLOVER AVENUE  
FONTANA, CALIFORNIA